





To:

Office of General Counsel

Federal Election Commission

999 E Street, N.W.

Washington D.C. 20463

From: Douglas C Curtis

Englewood, Florida 34224

Date: June 19, 2018

Subject: Complaint MUR #7376

I Douglas Curtis Have Answered the questions with regards to the information attached to the best of my knowledge. Please note I have highlighted in yellow so called possible complaints. I also highlighted in red my responses.

I have attached the following Exhibits which is located at the back of my responses.

Exhibit #1 Balance of Bank statements by month going back to 2015. Records are available

Exhibit #1A photo of Check register pertaining to amounts in question.

Exhibit #2 Notarized statement stating my office space was a Donald Trump Headquarters

Exhibit #3 January 16, 2018 January Newsletter where Bob Starr accusing me of trying to take over the REC when in fact at that time I was not even a member of the REC.

Exhibit #4 Newspaper Article from 2011 Show's Bob Starr's history

Exhibit 3%Approval for Extension until June 26, 2018

OFFICE OF GENERAL COUNS£L

2013 APR 30

MUR# 7376

Schedule of Enclosures

I Complaint

- 2. Addendum to April 17, 2018 CCREC internal audit. To REC Chairman Brown and RPOF Chairman Ingoglia. Noting possible illegal contributions and expenditures and recommending action from the Republican Party of Florida.
- 3. Campaign Treasurers Report for CCREC for 2016 applicable pages and narrative on entries. Full report can be viewed at www.charlottevotes.com
- 4 Credit card bill pertaining to Trump fund raiser hall rental.
- 5 Respondent and others contact information
- 6. Oath and affirmation
- '7. January 23,2018 Correspondence from Charlotte County R.E.C Chairman Mike Brown asking RPOF Chairman Ingoglia to stop the club activities by pulling their Charters
- 8 February 12,2018 Correspondence from Charlotte County State Committeeman Bob Starr Asking RPOF Chairman Ingoglia to revoke the club charters.

April 23, 2018

MUR# 737C

Office of General Counsel Federal Election Commission 999 E street, N.W Washington DC. 20463

Dear Sir:

I am Bob Starr the elected Republican State
Committeeman for Charlotte County Florida. I was elected in 2016- In 2017
I was appointed as a member of an audit committee by the new Charlotte

County Republican Party Chairman, Mike Brown to perform the required

in house audit of the financial- activities of the Charlotte County Republican Executive Committee for the calendar year of 2016.

The audit committee found possibly serious violation of Florida Statutes and Federal Campaign Finance law, Bipartisan Campaign Reform Act. I have included the addendum to the audit which informed the Republican Party of Florida of the possible violations of federal and state law. The Republican Party of Florida did not act to correct the violations. (I have included the quarterly filing reports for 2016 by the Charlotte County Republican Executive Committee along with narrative concerning the items in question)

1. I have been President of West Charlotte County Republican Club from 2017 and 2018. I have not seen Bob Star or Mike Brown from the time I have been elected. I was asked to meet with them last year and could not make the date due to business conflict. I have tried along with the Charlotte County Republican Club to meet but the REC canceled or refused. (Documents can be provided from emails going back and forth.

Prior to 2017 I was 1st Vice President of West Charlotte County for several years. Note: I was not the President in 2016. It appears Mike Brown and Bob Star did not even know who the President was.

After reading the complaints it is noticeable Bob Star makes innuendos of purposely violating rules when he has never confronted anyone at West Charlotte County Republican Club and in fact not even knowing the facts. He uses such statements "May have been", "May be the tip of an Iceberg", "We believe" "Possible Used". And not one time every questioned me of any of Mr. Starr concerns.

The Charlotte County Republican Party R.E.C Chairman Bill Folchi for several years allowed two of Republican Party of Florida Chartered Clubs in Charlotte County, The Charlotte County Republican Club and the West Charlotte County Republican Club, to raise thousands of dollars, which they contributed to the Charlotte County R.E.C. in violation of state law and as these dollars were spent by the party on federal candidates these contributions to the Charlotte County REC by the clubs may have made the two clubs in violation of federal law...

2. There are no limitations on the amount of money the Republican Clubs are allowed to raise. See Exhibit 1 at back of report showing the bank balance at the end of each month going back to 2014.

The Charlotte County Republican Club and West Charlotte County Republican Club through their fund raising events raise thousands of dollars every year. The maximum political expenditure for a Republican club for political activities is \$500.00 total. These dollars have been fume-fed into the R.E.C. events in violation of Florida State Law (FS 106). The Charlotte County Republican Club and The West Charlotte County Republican Club also contributed thousands of dollars to the Charlotte

County R.E.C which may have been spent in support of a federal candidate Donald Trump to buy bill boards and other activities which may have been in violation of M/F Bipartisan Campaign Reform Act and possibly other federal laws.

The West Charlotte County Republican Club and its officers Doug Curtis and Charlotte County Trump Campaign Chairman Ray Corcoran in addition to the possible money laundering activities with the CCREC went one step farther. As is explained in the audit addendum. (Included) With the sponsorship of the West Charlotte County Republican Club and The Charlotte County Executive Committee held a fund raising event for Federal Candidate Donald Trump.

They spent over \$4,000.00 for a venue for campaign fund raiser for Candidate Trump. (See CCREC quarterly Report) Then collected contributions from the people attending the event for the Trump Campaign. it was not clear what happened to the contributions for the Presidential Candidate Donald Trump we were told the proceeds were sent to the Trump Campaign.

3. I was not president of West Charlotte County Republican Club in 2016 however as First Vice President we did have a Trump Rally. Prior to the rally Bill Folchi recruited Ray Corcoran as a Trump Chairman for Charlotte County. Ray and I have teamed up years ago to help drive our club with a mission to get Republicans Elected. I had a business office in Grove City, Fla and another Office in Paul Morris Industrial Park, Englewood where we had held the WCCRC board meetings at no cost. We did on several occasions use my offices in conjunction with the board meetings to discuss how to promote Donald Trump for President. I never received any dollars from anyone or any organization. In fact I held one of the meetings in my home and again I did not receive any dollars. (See Exhibit 2)

With regards to getting Donald Trump elected the whole purpose was to draw attention to Donald Trump. I received no money from anyone to use my office. We had no idea of how many people would show up for the Rally. Some said we would be lucky to get 50 people when in fact it was over 700.

At the hall, the management of the hall wanted to be paid up front. Bill Folchi used his REC credit card and the money collected for food, drinks and games help pay the REC back. A check written by the treasurer Claudette Curtis was made out to

the REC to cover the Credit card advance. Any checks the attendees made out to Donald Trump was sent directly to Trump Headquarters in NY. By Ray Corcoran who was Trump Campaign Manager for Charlotte County.

The audit addendum also highlighted thousands of additional dollars that may have been illegally spent on the Donald Trump Campaign by the CCREC. Additionally the West Charlotte County Republican Club and the Charlotte County Republican Club each financed a Trump Campaign Office In two different areas of Charlotte County which were paid for and operated by the clubs.

4. I Doug Curtis made my offices available to hold the WCCRC board meetings. Previous we held our board meetings in a Restaurant and I had a boardroom available in each of my offices. One office I shared with an accounting firm and the other office is in my Plumbing business. We used those facilities for it was more private. I never had a Donald Trump Campaign Office.

I have no knowledge of any Punta Gorda office. (See Exhibit 2)

This may be just the tip of the iceberg. I was told by a former treasurer of the Charlotte County REC. That Chairman Folchi during the 2012 election cycle wanted to contribute to Senate Federal Candidate Connie Mack \$10,000.00. He was told by the treasure of the party Lou Spacco and his board that contribution to a Federal Candidate would be illegal. The next quarterly report contained the \$10,000.00 contribution to Connie Mack a federal candidate. When REC Treasurer Spacco asked Chairman Folchi why he wrote the check in opposition to his boards advice he was told He could do what he wanted he was the Chairman. Mr. Spacco resigned as CCREC Treasurer. I have no knowledge of the above paragraph.

It is totally frustration trying to run an organization where the Republican Chartered Clubs. Want to continue the activities that they have been doing for the last 5 years and the Republican Party of Florida will not help stop it. I first contacted the Republican Party of Florida in early 2017 after the Audit Committee found what we believed may have been serious violations of state and federal law. The Republican Party of Florida did not do anything about the allegations. The Chairman of the Charlotte County Republican Executive Committee, Mike Brown and I have contacted the Republican Party of Florida numerous times to try to correct the situation over the last several months with no action by the party.

5. What is frustrating to me is if this was such a big concern to Bob Star and Mike Brown then why they never asked to sit down review all their concerns. I have documentation where the clubs have asked for meetings so we could iron out concerns and leave with a plan that could be executed by everyone.

There was no numerous times of trying to correct any situation over the last several months as stated in the complaint. I kept all emails from the REC and the two clubs.

On April 732018 at the R.P.O.F Quarterly meeting.in Tampa RPOF Chairman Ingoglia called the West Charlotte County Republican Club and Charlotte County Republican Club Officers to Tampa to meet with me concerning the allegations. The Charlotte County Club President Gene Murtha stated in his opening statement that the clubs had contributed thousands of dollars to the Charlotte County R.E.C from their significant fund raising events. The two clubs asked for the meeting (Email can be provided)

An admission of violation state law. Mr. Corcoran Trump local campaign coordinator admitted that he used over \$4,000.00 of West Charlotte County Club money to pay for a fund raiser for Donald Trump and then collected cash and checks which were sent to the Trump Campaign. The over \$4,000.00 spent is in violation of the \$500.00 state maximum to be spent on political activities and may be a violation of expenditures for a federal candidate by a club or any other entity without a Federal Account. The Trump Chairman for Charlotte County, The REC Chairman along with A Representative for Trump that handled several counties along with the WCCRC board agreed to help get the vote out and agreed to the Rally.

The undetermined monies collected for the Trump Campaign in cash and checks at the event could amount to money laundering.

6. The definition of Money Laundering is "The concealment of the origins of illegal obtained money. Typically by means of transfers involving foreign banks or ligament business".

The real frustration for me and the West Charlotte County Republican Club is we had the ok from Sarasota Trump Headquarters, The Trump Chairman of Charlotte County Ray Corcoran, The REC Chairman Bill Folchi, along with others of REC. Only thing occurred was a few people asked if they could give a check donation and was handed to Ray Corcoran who placed it into an envelope and sent it to The Trump Campaign Head Quarters.

With regards to the Bus trip – I was asked to attend with the understanding each person would pay their own way. I did not attend

With these admissions of violations of state and possibly federal law at the meeting by the participants in front of the RPOF Party Chairman, Party Director, Party Attorney, National Committeeman, National Committeewoman and I the State Committeeman from Charlotte County the RPOF Chairman still refuses to pull the charters of the West Charlotte County Republican Club and the Charlotte County Republican Club. The Club Charters state that any violation of the law will result in the charters being revoked. The admission of the violations of state and federal law by the participants should have been sufficient for immediate revocation of the club charters. The possibly illegal activity of the clubs and CCREC was brought to light a year ago and the clubs are still permitted to operate under the Republican Party of Florida umbrella.

7. One would think if there were concerns over a year ago someone would come out to the clubs and ask for an audit from the CREC and would have communicated directly with the President in 2016. The WCCRC has conducted each year a complete audit within its club by a team excluding the President. Records are available. All monthly records are available going back years.

I am presenting my evidence for the 2016 Presidential election year. I am convinced that serious violations of state and federal law may have occurred in other years not only in Charlotte County but probably in the Other 66 Florida counties.

8. A lot of accusations with out direct commucation with WCCRC board members. Why then did the board and the members of CCEC vote me in as a member in this past May, 2018. I don't get it.

Bob Star

, Punta Gorda Fl- 33982- 1.1.777 773

NAMES AND CONTACT INFORMATION FOR PEOPLE NAMED IN THE COMPLAINT

Charles Counsil

: Punta Gorda FI 33950

t President of the Charlotte County Republican Club.

2016

Murtha Gene

Punta Gorda FL 33950 Current President

ofthe Charlotte County Republican Club

Doug Curtis

FI 34224

President of

the West Charlotte County Republican Club' '......

Raymond Corcoran

Port Charlotte FI 33981

t Charlotte County Trump Campaign Chair 2016

Bill Folchi

: Punta Gorda FI. 33950 33950

1 Chairman CCREC 2016

James Druyon

Punta Gorda FI 33950 Treasurer CCREC

2016

Charlotte County Republican Club P.O.Box 512332 Punta Gorda FI.33951

.West Charlotte County Republican Club PO. Box 271 Placida FI 33946.

Lou Spacco:

Port Charlotte 33981

former treasurer of the CCREC

Schedule of Enclosures

- 1. Complaint
- 2. Addendum to April 17, 2018 CCEC internal audit. To REC Chairman Brown and RPOF Chairman Ingoglia. Noting possible illegal contributions and expenditures and recommending action from the Republican Party of Florida.
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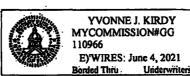
- 4. Credit card bil pertaining to Trump fud raiser hall rental
- 5. Respondent and other contact information
- 6. Oath and Affirmation
- 7. January 23, 2018 Correspondence from Charlotte County State Committeeman Mike Brown asking RPOF chairman Ingoglia to stop the club activities by pulling their Charters.
- 8. February 12, 2018 Correspondence from Charlotte County State Committeeman Bob Starr asking RPOF Chairman Ingoglia to revoke the club charters

Oath

State of Florida County of Charlotte

I swear or affirm that the above information is true and correct to the best of my knowledge,

Sworn to and subscribed to me this 23 day of April 2018 Dy Robert (Bob) Starr Signature of Notary Public Print, Type of stamp commission name of Notary Personally known to meor produced identificationType of identification produced	Original signature of the complainant
Signature of Notary Public Print, Type of stamp commission name of Notary Personally known to meor produced identificationType of identification	Sworn to and subscribed to me this 23 day of
Print, Type of stamp commission name of Notary Personally known to me or produced identification Type of identification	April 2018
Print, Type of stamp commission name of Notary Personally known to me or produced identification Type of identification	by Robert (Bob) Starr
Personally known to meor produced identificationType of identification	Signature of Notary Public
Personally known to meor produced identificationType of identification	Done S. Kirdy
identification Type of identification	Print, Type or stamp commission name of Notary
	identification Type of identification



ADDENDUM TO TI--Œ C.C.R.E.C AUDIT April; 10 2017

To: C.C.R.E.C. Chairman Mike Brown CC. To attention Chairman Ingoglia

The April 10 2017 audit of the C.C.R.E.C. the audit committee noted some expenses which may have been made in support of a federal candidate, The C.C.R.E.C does not have a federal campaign account we believe these expenses may have been made in violation of Federal Campaign Finance Law. Some examples follow

9..Bill Folchi chairman of the REC approved the expense from the WCCRC portion of the expense. West Charlotte County Republican Club paid \$1,665 by check and another check for \$216 for advertising promotions to get awareness to elect Republicans.

Reimbursement to Maxilyn Bulifant for federal candidate publicity \$704.10 10. nothing to do with the WCCRC

U.S. Coachways Bus transportation to federal candidate Rally \$1,120.88

11. I Doug Curtis not involved

Englewood Events Center \$4,196.00 federal candidate Rally Expense ---

This Rally was sponsored by the West Charlotte Republican Club. They did reimburse the C.C.R.E.C the \$4196.00.

10. The \$4,196.00 was the cost of food, soft drinks and Hall. Bill Folchi paid the bill using his REC Credit Card and WCCRC Bill Folchi was back same night on 10/24/2016 with check number 1451.

It is our understanding that over \$3,000.00 was collected at the event for a federal candidate We do not know exactly how much was collected for the federal candidate or how it was disposed of.

12. Any checks attendees gave was collected by Ray Corcoran who was Charlotte County Trump Campaign Chairman. All checks collected was placed in an envelope by Ray Corcoran and sent to Donald Trump Campaign headquarters.

It is our understanding that additional monies were collected from the sale of Trump campaign shirts, hats etc. There is no actual accounting of the monies from the sales at the H.Q. We were told that when cash was paid for an item the cash was turned over to the Treasurer and others. There is no record of the cash being deposited From the entries in the record it looks like the cash may have been accounted for by a personal check from the treasurer and others recorded as a personal contribution.

13. There was no money collected for shirts or hats. WCCRC a few years ago ordered WCCRC hats and shirts. WCCRC ordered shirts few years ago where the manufacture made a mistake and made the shirts wrong by size. They told us to keep the shirts and replaced with proper sizes. We did give some of them away along with a few hats and visors we had left over from the past years. The WCCRC did not sell any Trump clothing or hats. All Mr. Starr had to do was ask! The Treasurer has kept detailed records of every dolar that was spent as well as income. The books is and has always been available for additional audit over and above the yearly audit. Not sure where the above information has come from. Lot of innuendos.

We are providing this information to the local patty and the Republican Party of Florida for further action if deemed necessary.

Respectfully submitted by

Bob Starr, Chairman of the Audit Committee April 10, 2017

14. As Chairman of the Audit Committee why did not Bob Starr ask to review the books even after they had already been audited each and every year?

Why did he not ask the presidents of each club to have a yearly review of the past year and the year coming up?

It appears all of this could have been avoided or if felt with proper evidence that a more closely review should be call for. This seems so untrue to the American Way.

Narrative of the 2016 quarterly Campaign Treasures Report filed by the Charlotte County Republican Committee on file with the charlotte County Supervisor of Elections

Reporting dates 8/26/2016 through 11/3/2006

Itemized Contributions:

10/24/2016 West Charlotte County Republican Club \$4,196.00 Reimbursement for rent for Englewood Fl. Event Center for federal candidate Donald Trump fund raiser. Violation of the \$500.00 per year max political contribution state statutes and support of federal candidate without proper documentation M/F Bipartisan Campaign Reform Act or other federal laws.

15. This item was addressed in the complaint above.

4/22/2016 Charlotte County Republican Club \$5,700.00 Violation of the \$500.00 per year max political contribution in violation of state statutes

and possibly used by the CCREC to support Federal Candidate Donald Trump without proper documentation in violation of M^IF Bipartisan Campaign Reform act or other federal laws

4/22/2016 West Charlotte County Republican Club \$1,000.00 Violation of the \$500.00 per year max political contribution in violation of state statutes and possibly used by the CCREC to support federal candidate Donald Trump in violation of M^IF Bipartisan Campaign Reform Act and other federal laws

6/16/2016 Charlotte County Republican Club \$216.00 Violation of the \$500.00 per year max political contribution in state statutes and possibly used by the CCREC to support a federal candidate Donald Trump in violation of M/F Bipartisan Campaign Reform Act and other federal laws

8/4/2016 West Charlotte County Republican Club \$1,881.00 Violation of the \$500.00 per year max political contributions in state statutes and possibly used By the CCREC to support a federal candidate Donald Trump in violation of MIF Bipartisan Campaign Reform act.

Itemized Expenditures:

8/7/2016 ABC Signs & Shirts Promotional Material \$1,201.14 Trump Promotional material Trump Signs etc.-I have been told that the material was sold at the REC Headquarters Port Charlotte for cash with no record of who from the public bought the items or how the money from the sales was accounted for.

8/8/2016 Billboards USA \$5,000.00 Billboards for the election of Donald Trump in Violation of the M/F/BCRA The West Charlotte Republican Cluband the Charlotte County Republican Clubs may have contributed funds to the REC for these Billboards.

8/14/2016 reimbursement to Marilyn Bulifant for grand opening of the Port Charlotte Trump Campaign office \$712.71

10/24/2016 Tom Wilson music at TRUMP Picnic \$267.50 possible WF BCRA or other federal law campaign violation.

10/24/2016 Marilyn Bulifant \$704.10 reimbursement of expenses for TRUMP picnic possible violation of M/F BCRA or other federal law.

10/27/2016 City of Punta Gorda \$ 171.20 Rental of Park for Trump Picnic possible violation of MfFBCRA or other federal law.

I have also included a Sun Trust Credit Card statement for the CCREC showing a \$4,196.00 charge to reserve the Englewood events center for a fund raiser for federal candidate Donald Trump. Sponsored by Ray Corcoran Trump local Campaign manager and the West Charlotte County Republican Club. Thousands of dollars thousands of dollars were collected for candidate Trump and was sent up to his campaign.

Additionally three Trump Campaign offices were established in Charlotte County. The Charlotte County Republican Executive Committee was paying the rent and other office expenses, for the Port Charlotte office during the campaign from their operating account not a federal account the Trump Campaign Office may have been in violation of MIF BCRA or other federal laws.

West Charlotte County Republican Club Also had a Trump Campaign office in Englewood Fl. as did the Charlotte County Republican Club in Punta Gorda Fl. I would assume the funds expended by the clubs may have been in violation of M/F BCRA, other federal laws or State Statutes regarding how much organizations can spend in political pursuits currently \$500.00.

15. This was addressed in the complaint above.

CAMPAIGN TREASURER'S REPORT ITEMIZED EXPENDITURES

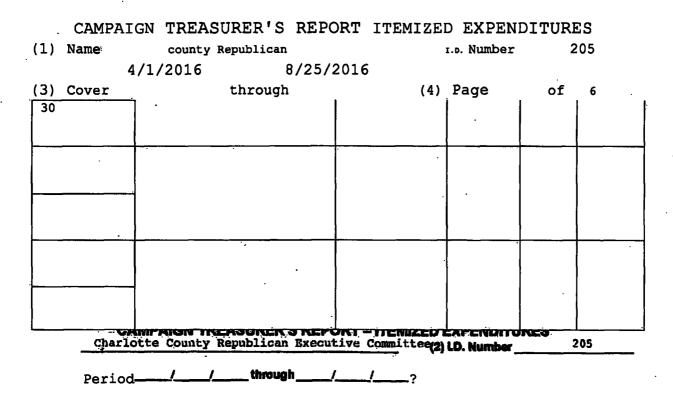
(1) Name Charlotte County	y Republican Executive	r.m. Number	205
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(3) Cover Period through (4) Page of

Charl	lotte County Republic	an Executive Committee(2)	LD. Number		205.
.——	8/26/2016 //throug	11/3/2016	Page 4	4	
Date (6) ce Number	(7) Full Name (Last, Suffix, First, N Street Address of City, state, Zip Co	& (add office sought	Expenditure Type	(10)	(11) Amount

	(7)		\' '	1 120,	(11)
Date (6) Sequence Number	Full Name (Last, Suffix, First, Middle) Street Address & City, state, Zip Code	Purpose (add office sought if contribution to a candidate)	Expenditure Type	Amendment	Amount
25	Watson. 1 ¹ Nm urn Tree Punta Gorda, FL 33955	music at tE ump picnic	МО		\$267.5
10/24/2016	Bulifant, Marilyn Port Charlotte, 33980	reimburse for expenses for trümp picnic			\$704.1
27 27	Comcast P.O. BOX 105184 Atlanta, GA 30348	coumni.catJ-ons	МО	•	
28	Cl. of Punta Gor a, 326 west Marion Ave Punta Gorda, FL 33950	rent o par K.			\$171 .2
10/30/2.016	s COM, P.o. BOX 3480 Chicago, IL 60654	web site	МО		\$0.9
10/30/2016	Watson. Tom Punta Gorda, FL 33955	music and sound system	МО		¥775.7

DS-DE 14 (Rev.)



(5) Date (6) Sequence Number	(7) Full Name (Last, Suffix, First, Middle) Street Address & State, Zip Code	(8) purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	Amount
4/25/20• 6	Harbour Graphics , 3415 Taraiart•ci Trail Punta Gorda, FL 33950	printing	мо ·		\$642.0
10	Suntrust Bank, PO 80x 79.1250, Baltimore, FL 21279	bank fee			\$6.0
2	Comcast , P.o. Box 105.184 Atlanta, GA 30348-5184	te ep one	МО	·	\$112.4

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CAMPAIGN TREASURER'S REPORT ITEMIZED EXPENDITURES

(1)	Name Charlotte County	Republican Executive Committee(2)	1.D. Number	205
	4/1/2016	8/25/2016		

	4/1/2016 8/	25/2016			
(3) Cover P	eriod through		(4) Page	of	6
11					
12	1780 West. Marion Av. Punta Gorda, pr. 33950	Inco n day dinner	МО		10,712.3
4/26/2016	Folchi, 33950 Bill Punta Gorda,	supplies for lincoln day dinner	МО		\$69.5
4/28/2016	24 Event twentyOne Center , pl. 33952 2421 [l'amiami port Charlotte	rent	МО		
4/28/2016	Donert Jan FL 33952 . Port Charlotte ,	postage	МО		\$24.3
4/29/2016	DonerF Jan Port Port FL 33952 Charlotte,	postage 3952	MO		\$6.4

(5)	(7)	(8)	(9)		(11)
Date (6) Sequence Number	Full Name (Last, suffix, First, Middle) Street Address & City, state, Zip Code	Purpose (add Office sought if contribution	Expenditure Type	Amendment	Amount

DS-DE 14 (Rev.)

CAMPA	IGN TREASURER'S RI	EPORT ITEMI	ZED EXPEN	DITURE	es
(1) Name	county Republican		1.D. Number	2	05
	4/1/2016 8/2	5/2016			
(3) Cover	through	•	(4) Page	` of	6
		to a candidate)			
4/1/2016	Roberson t Ken P.O. BOX 495096 Port Charlotte, FL 33949	rent	МО		\$267.5
·.1					
4/11/2016	Monarch Printing 1264 Market Circ.Le Port Charlotte, 33953	printing	МО		\$54. B
2					_
3	Suntrust Bank , Sunt:rust Bank, PO Box 791250* Baltimore, MD 21279		МО		\$96.9
01	Barry Jol e t , Punta Gorda FL	supp les or 3s9000].n day			\$50.0
4	Punta Gorda, 32950	:			
4/17/2016	Captaing Table Restaurant , 1200 W. Retta Esplanade, Punta Cord	scholarship dinner , Florida 33950	MO .		\$510,0
5	Punta Gorda, 33950				
4/18/2016	Mil J. er. Punta Corda FT., 33950	decorations for Lincoln dinner	\$		\$403.1'
6	: ·				:
	Charlotte High School, 1250 Cooper Punta Gorda, FL 33950	jnro¿c color guard	МО		\$75.0
7	ı	!			İ

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SEE REVERSE FOR INSTRUCTIONS AND CODE VALUES

CAMPAIGN TREASURER'S REPORT ITEMIZED EXPENDITURES

(1) Name Charlotte County Republican Executive Committee (2) 1.b. Number 205

4/1/2016

8/25/2016

(3) Cover	Period	through		(4) Page	of	6
8	Charlotte Hi 1250 Coooer si FL 339 Punta Gorda F	t, Punta Gorda,	singers 0			\$50.0
			•			

CAMPAIGN TREASURER'S REPORT ITEMIZED

EXPENDITURES

Count Republican Executive Committee (2) I.D. Number (1) Name

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4/1/2016

8/25/2016

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Period

	through/_	/ (4) Pa	ige3	of 6	
(5) Date (6) Sequence Number	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, state, Zip Code	(8) purpose (add office sought if contribution to a candidate)	(9) Expenditure	Amendment	Amount
5/3/2016	Roberson r Ken P.OoBox 495096 Port. Charlotte, FL 33949	ren t	MO		\$267 .5
5/25/2016	Comc ast, P.O. BOX 105184, Atlanta, FL 30348-	telephone			\$112 . 43
5/25 2016	Comcast P.O. Box nt. I anta 3034B Atlanta, GA 30348-5184	telephone 184			\$112 . 4
5 25 2016	Wayt.)ut Enterprzses, 3587 poultry Street, FL 34266	photography	МО		\$215.2-
5/25/2016	CCRC P no. Box 512332, Punta Gorda, 33950	correct over oawment.	МО		\$150 . 0

DS-DE 14 (Rev.)

SEE REVERSE FOR INSTRUCTIONS AND CODE **VALUES**

CAMPAIGN TREASURER'S REPORT ITEMIZED

EXPENDITURES (1) Name Charlotte County Republican Executive Committee(2) 1.B. Number 205 4/1/2016 8/25/2016 (3) Cover Period through of (4) Page 2.1 5/26/2016 2.4Event, Center 2'! \$214 . 0(21 Tami ami port Charlotte, 33952 5/26/2016 Doner, Jan meeting \$59. 8" supplies Port Charlotte, FL 33952 23 5/27/2016 Charlotte County publicity \$1,497.0 Chamber of Co, 2702 frail, port Charlotte, 33952 24

(5)	(7)	(8)	(9)	(10)	(11)
Date	Futi Name	Purpose			•
(6)	(Last, suffix, First,	(add office sought if	Expenditure	[
Sequence Number	Middle) Street Address &	contribution	Туре	Amendment	Amount
Mamber	City, state, Zip	to a			
	code	candidate)			
6/3/2016	Roberson, Ken P.O.Box 495096	rent			\$267.5
·	Port Charlotte, FL 33949				•
25		•		 	
6/10/2016	Suntrust Bank/ PO BOX 791250 Baltimore, MD 212 79	visa bill			\$47. I

through

DS-DE 14 (Rev.)

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ITEMI.

EXPENDITURES

- (1) Name Charlotte County Republican Executive Committee (2)
- I.D. Number

8/25/2016

	Period through		(4) Page	of	6
26					
1 2016	.4 twentyOne Event Center , 2421 camiami Tr, Port Charlotte, FL 33952	rent	MO	·	\$214.0
2 , .0	u -a .0 gra· f. x, 18320 Paulson Dr. Unit A Port Charlotte 33948	pri.nt].ng	МО		48.2
7/3/2016	Roberson, Ken p.o.Bažc 495096 port Charlotte, 33949	rent	мо		\$267.5
7/12/203.6	Suntrust Bank, po Box 791250, Baltimore, 21279	visa bill	МО		\$54.8
7/14/2016	Sun Flea Market 23170 Harborview Road Charlotte Harbor, F 33980	rent	MO		\$528.7
7/14/2016	NAACP , P.O. Box 512539 Punta Gorda. 23941	donation	MO		\$200.0
	/ 1 3				

	4/1/2016	8/25/2016	
Period_		through/	5
	·	•	

CAMPAIGN TREASURER'S REPORT ITEMIZED EXPENDITURES

(1) Name Charlotte County Republican Executive Committee(2) 1.0. Number 205

4/1/2016

8/25/2016

(3) Cover P	eriod through		(4) Page	of	6
(5)	(7)	(8)	(9)		
Date	Full Name	Purpose			
	(Last, Suffix, First,	(add office	Frinandi tuna		
(6) Sequence	Middle)	sought if	Expenditure		
Number	Street Address &	contribution	Туре		
	City, State, Zip Code	to a			
		candidate)	[Amendment	Amount
7/25/2016	Comcast	commutations			\$112 ,4
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	P.O. BOX 105184,	ĺ	i ·		
	Atlanta, GA 30348-	1			
33	5184	ł	ł		ŀ
33					
7/20/2016	24 twentyOne Event.	rent			\$214. o
1/20/2010	Tamiami Tr. Center	1			7227. 0
	Tamiami Tr, 2421				
34	Port Charlotte, FL 33952				
74					
		1	!		
7/14/2016	RPOF House campaign,	don at 1 on	MO		\$4
1/14/2010	420 East Jefferson Street,		1		,000,
	Tallahassee, FL 32301				,,,,,
35					
33			Ì		
· ·	·		l ,		
7/28 2016	Doner, Jan 33952	reimburse	МО		
1/20 2010	:	for			
ł	Port Charlotte, FL	mailings			ł
36		and			
		supplies	1		
		1			
8/1/2016	West Charlotte County	donation	MO	<u></u>	\$100 .0
0/1/2010	Republic ,				
·	8501 Placida RD.			·	
37	Placida, FL 2.3946	1			
[- '					
		1	ł		Į
8/9/2016	Suntrust Bank,	visa bill			\$119 .2.
' '	PO Box 791250	1	Į .		
		<u>.</u>			
·					

DS-DE 14 (Rev.)

SEE REVERSE FOR INSTRUCTIONS AND CODE VALUES

CAMPAIGN TREASURER'S REPORT __ ITEMIZED

EXPENDITURES

- (1) Name Charlotte County Republican Executive Committee (2)
- I.D. Number

8/25/2016

(3) Cover E	Period	through	(4) Page	of	6
	Baltimore * MD 21279					
8/5/2016	Roberson, Ken 495096 Port Charlotte,	rent. FL 33949		MO.		
3 9						
8/7/2016	ABC signa & Shirts 5851 LaRue Steine Theodore, AL 3658	mater	t ional			
	Rd.					

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CAMPAIGN TREASURER'S REPORT ITEMIZED EXPENDITURES

		1.D. 1	Number		
Charlo	tte county Republican				
Period	through				
Nat¥	4/1/2016 9/25	cutive Committee	EXPENDIT	URES	205
) Cover Perio	4/1/2016 8/25 od/ through	5/2016 /	4) Page6	of	6
(5) Date	(7) Full Name	(8) Purpose	(9)	(10)	(11)
(6) Sequence Number	(Lest, Suffix, First, Middle) Street Address & City, State, Zip Code	(add-office sought if contribution to a candidate)	Expenditure Type	Amendment	Amount
3/8/2016	Billboards USA, 6819 Del Har Terrace, Naples, FL 3 Naples, FL 34105	billboards 105	мо		\$5,000.
1 /14/2016	Jollott, Barry Funta Gorda, FL 33950	reimbursement for sopplirs	МО		\$109.
8/14/2016 //	Bulisant, Marilyn Port Charlotte, FL 33980	reimbursment for expenses connected with our grand opening of hg	МО		\$712.
1/18/2016	Frantz, Sarah ***Protected***	scholarship winner	NO	·	· \$500.
3/19/2016 //	24 twentyOne Event Center, 2421 Temiami Tr Port Charlotte, FL 33952	rent	MO		\$214.
11		·			
11					·
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CAMPAIGN TREASURERS REPORT - ITEMIZED CONTRIBUTIONS

C/	AWIPAIGN TREASUR	EN3	REPORT	HEIVIIZEL	CONTRIBU	HONS	
(1) Name	^						
			8	/25/2016			
(3) Cover Peri			ough				
(1) Name	Charlotte County R	epubl	ican Execu	tive Commi	శ్రీ శ్రీమీ. Numbe	er 2	205
	4/1/2016			/25/2016		_	_
(3) Cover Peri	iod / /	tha	ough	''-	(4) Pag	je <u> </u>	of
(5) Date	(7) Full Name		(8)	(9)	(1.0)	(11)	(12)
(6) Sequence	(Last, Suffix, First, Middle) Street Address &	_	ontributor	Contribution	In-kind		_
Number	City, State, Zip Code Charlotte County	. Type	Occupation political	СН	Description	Amendment	Amount \$216.0
6/16/2016	Republican Cl, PO Box 512332, Punta Gorda, FL 33960		club	Ç			722710 1
49	Punca docum, FA 33560			•			
7/15/2016 / /	McCarthy. Ellen Fort Charlotte, FL 33948	I	,	CA			840.0
50							
8/4/2016	West Charlotte County Republic, 8501 Placida RD, Unit 3,	0	club	CH			\$1,881.0
51	Placide, FL 33946						
8/4/2016	RPOF, P.O. Box 311, Tullahassee, FL 32302	P		CH			\$4,644.44
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CAMPAIGN TREASURER'S REPORT ___ ITEMIZED CONTRIBUTIONS

(1) Name

8/25/2016

(3) Cover	(3) Cover Period through of						
	Charlotte Count	y Re	publican 1	Executive Com	[™] {\$}¶₽. Nn	mber	205
	4/1/2016			8/25/2016		e	_
eri	od/		through	/ <u>/ /.</u>	(4)	Page 6	of ⁷
(5) Date	(7) Fult Name		(8)	(9)			
(6)	(Last, Suffix,					1	
Sequence	First, Middle)	Con	tributor	Contribution	ļ .		
Number	Street Address	00	cu ation		In-kind		
	Ci State, Zi				Descri		
	Code				tion	Amendment	Amount
4/22/2016	Supez Gertrude	1	•etired				\$125 . 0
4/22/2010	St .						
	Arcadia, FL 34266						
	Markey t Mart hia	1				 	\$100 .0
4/22/2016	pa 1013 pxcadi.a,	1				İ	
	34206						
42			ļ				
		<u> </u>				<u> </u>	
4/22/2016	Kirschnerr Louis						\$100 .0
	4						
43	Ave . Arcadia, 34266		,	1		`	
43		ĺ	i '			1	
	Zolkos reed	1		СН			\$50 .0
4/22/2016	P.O. BOX 1457 Arcadia 34266	_					
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			0.11			 	
4/22/2016	Charlotte County	0	01 it. i cal]	\$5,700.0
	Republican Cl		lub			•	
	P.o. Bax 512332 Gorda, FL 33952						
4/29/2016	Greg Stube	0	0.1 1				\$500 .0
1	Campaign 133 Harhor Dr. S.		tic-al -				
	Verlice, 34285		ampai.gn				
46		[
	B	<u></u>	lost inc	-			6150 -
	Executive Heat ilžc«f	В	leat ing				\$150. o
1		L	<u> </u>	<u> </u>	<u> </u>		

CAMPAIGN TREASURERS REPORT - ITEMIZED CONTRIBUTIONS

(1) Name

8/25/2016

(3) Cover Pe	riod	through	
47	Cooling 1205 Eli zbeth Sta STE D Punta Gorda, 33950		
6/10/2016	Republic		\$216 .0
	P.Q. 5Y1985 Punt-a Gorda, FL 3325#		

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CAMPAIGN TREASURERS REPORT ITEMIZED CONTRIBUTIONS

(1) Name 8/25/2016 (3) Cover Period through 4/1/2016 through _(4) Page -(5) (8) Date Full Name (Last Suffix, (6) First, Middle) Contributor Sequence Contribution Street Address Occu ation Number In-kind Description | Amendment Ci State, Zi Code Amount Seavp Pamella \$100 .0 4/22/2016 art Charlotte , 33980 33 O ol.itical Peace River \$800 . 0 4/22/2016 Federated Republic PO Box 1985 4/22/2016 Burnt Store 0 political CH \$1,200 Republican .0 Club, 3420 Sunset Key Cir. 35 Punta Gorda, 33955 West Charlotte 0 001 it CH \$1,000.0 4/22/2016 County •X cal Republic, P.o. 271 Placida, FL 33946 36 Bandel, Teresa 4/22/2016 Punta Gorda, FL 33950 4/22/2.016 Charlotte heart oct.ars vascular ins, 25097 Olympia Ave Punta Gorda, 33950 38 pierce * real a CH \$250 . 0 4/22/2016 Clifford ltor Arcadia, 34266 39

\$100 . 0

Larry A.

4/22/2016 |Liedke ,

 	· .	l t	1	1	i .	1	1
40	is. FL 342 66 2866 Arcadia,						

DS-DE 13 (Rev. 11/13)

	/ 1 \ Name	Charlotte County	·Renu	hlican Exe	icutive Com	(2). J.D.y.,		
	205	4/1/2016			/25/2016		er	
	(3) Cover	7 through /				- ·· -		-
	(5)	(7)		(8)) Page		4	ı ————————————————————————————————————
	Date	Full Name		(0)	(3)	}		
	(6) Sequence Number	(Last, Suffix, First, Middle) Street Address & C1 . State, Z1 Code		ntributor Occu ation	Contribution	in-kind Descri tion	Amendment	Amount
	4/22/2016	Druyor, Jim Punta Gorda, FL 33950		"etired				\$150 , 0
	25							
	4/22/2016	Roger Eaton Campaign 3855 Tami ami 'l'	0	ol.itical				\$400. 00
	26	ra i 1 pnnta Gorda, 33950				,		
	4/22/2016	Price, Julie punt-s Gorda, FL	0					
	27	33950						
	4/22/2016	Goldman, Tiseo & Sturges , 701 JC Center Court	В	law				\$150 .0
	28	Suita Charlotte, EL 33954						
	4/22/2016	Masuck, Stephen						
	29	Punta Gorda, FL 33950						
_	4/22/2015	14.cC.rory Taw Firm, 309 Tami ami Trail, PG FL	3950					\$150 .0
	30	Punta Gorda, 33950						
	4/22/2016	pontoriero Christino	1		CH .			

SUNTRUST AIGN TREASURER'S REPORT ITEMIZED CONTRIBUTIONS Page 1 of 1 -

Period

through

of

31	Port Charlotte, FL 33954				
4/22/2016	Jaraszew ^F ski :r. .Ti Maximilian 105 Leland se		 	·	\$100 . 0
	a sr port Charlotte, 33952		,		

DS-DE 13 (Rev. 11/13)

Your Business Credit Card Statement

BILLING CYCLE INEORMATION

.\$0.00 Previous Baiance, **Payments**

\$0.00

redits \$0.00

\$0.00 urchases & Other Charges

\$0.00 Cash Advances \$0.00 FINANCE CHARGES \$0.00

New Balance

11/16/2016 **Closing Date**

VISA

ACCOUNT SUMMARY

Account Number	XXXX XXXX XXXX
Total Credit Limit	\$13,500.00
Available Credit	\$13,489.00
Available Cash	\$0.00
Amount Over Credit Limit	\$0.00
Amount Past Due	\$0.00
Days In Billing Cycle	
Minimum Payment Due	\$0.00
Payment Due Date	

1 TO CRO

	•		Contact information Outsids	-
Toll Free 855-574-2423			U.S. (Cat Collecti	p.o. Box 4997
		3	407-762-7102	Orlando, FL 32802-4997
TRAN:	SACTIO	NS	•	
Trans Date	Post Date	Referetibe Number	Merchant Name or Transaction Description	Amount Credit Charge
	10-18	2461043MK09GOYKX6	THE HOME.DEPOT #6950 . PUNTA_GORDA FI	
<u> </u>	10-18	2449215MKSOS2YZQ2	COMPANDSAVE INK 877-465-6888 CA	147.96
	10-19	2473309ML60A4TBRB	ENGLEWOOD EVENT CENTER ENGLEWOOD F	L 4,196.00
10-26	10-27	2449215MWSI 12XEES	MAPLARGEINC 855-627-5274 GA	
	11-16		000000000000COMPC TOTAL PURCH \$4,367.35	HASES \$4,367.35 0.00 TOTAL

Finance Charge Detail	Average Daily Daily Periodic Barance Rate (may vary)		FINANCE CHARGE	Corres ondin ANNUAL PERCENTA& RATE	
Purchases	0.00	.02326%	0.00	8.49%	
Cash Advances	0.00	.045i6%	0.00	16.49%	

See reverse for additional information.

Page 1

4550 1700

1700 VN49 coog

161116 OIAQ5207 23583

VPLEASE DETACH HERE AND RETURN 30TTQM PORTION WITH YOUR PAW.".

January 23, 2018

Dear Chairman Ingoglia:

I am contacting you regarding two Republican Party Chartered Clubs in Charlotte County, In 2017 the required audit was completed by Charlotte County REC members, An addendum, to the audit was submitted to you as Chairman of RPOF and I as Chairman of the Charlotte County REC, stating that expenditures by the Charlotte County Republican Club and the West -Charlotte County Republican Club may have been made in violation of state and Federal Campaign finance laws._ According to RPOF club chartering conditions any violation of state or federal law would cause the club charter to be revoked. (See attached copy of CCREC audit),

With my election as Chairman, by the CCREC, in early March 20171 began the process of trying to bring the West Charlotte County Republican Club and the Charlotte County Republican Club into compliance with the provisions of their RPOF Charter and state and federal law.

This effort has been without success. In fact it has resulted in all- out war, by the two clubs against the CCREC.

16. I was asked once to attend a meeting and I had to cancel. I have all the emails where both the WCCRC and CCRC has asked for a meeting several times without any response.

The president of the Charlotte County Republican Club -Charlie Council sent an email to all club members and others telling them not to attend the CCREC first fundraising: event of 2017, Hog Wild. Pig Roast. The event was a total: disaster with poor attendance (see attached email) 17. I never heard about the email or ever saw one. In fact my wife and I attended had a decent time. We spent time with Board Members of the REC along with the members and other guest. All I ask is if there is a question or concern reach out to me and I will respond. All we are doing is hurting our goal of getting Republicans elected.

The new President of the Charlotte County Republican Club, Gene Murtha, as of January 2018, has sent emails calling for meetings to determine which events the CCREC is allowed to have in 2018. (See attached email)

18. Yes both clubs agreed to have some fun events to join forces to help get people out. One thing WCCRC has done in the past was to attend a ball game and thought why not join forces with the other clubs and there was participation besides the WCCRC and the CCCRC. We had members from the Charlotte / Desoto club and the Burt Store Club and had attendance from a County Commissioner.

Notice the WCCRC golf outing --- this is our tenth year. We have always had participation from all clubs including the REC.

Where is the war other than being accused of violations and not seeking to work together? MR. Star did not even know who the President of WCCRC was in 2016 and I'm not sure he still knows.

The West County Republican Doug Curtis President stated in the clubs January News Letter that he is going to have 4 members from the clubs appointed to the CCREC Board' so that the clubs will be able to control the CCREC. (See attached newsletter).

19. See attached newsletter and please read the highlighted area. I never stated I was going to 4 members appointed to the board. I was not even a member of the REC. With all of this hanging over me and the WCCRC the CCREC voted me in as a member in May 2018. I'm being accused of trying to get members to join the REC for purposes of me being on the board. I'm almost 76 years old with never having a desire to do so. I'm a business man with a couple of business as well as a Radio Talk Show. I am a Republican that wants to help get Republicans elected. I get accused of not having enough members in the REC and now for trying to get people voted in to the REC. What is this?

With the charges against the club and me why would the REC board vote me in a member of the REC with the pending charges?

Several members of the two Clubs Board of Directors have requested applications to the CCREC. I Ibelieve their intent is to disrupt and take over the operation of the CCREC so that the clubs can continue with business as usual.

20. At the time of this memo I was not a member of the REC and was just voted in last week. Why would I not try to get members voted into the REC.

There are many other issues with the two clubs mentioned, in this correspondence, which are problematic but do not stand in opposition to their charter. Such as raising thousands of dollars using the Republican name when they can only spend \$500.00 in candidate and party support.

21. It was my understanding (Doug Curtis) we are allowed to raise money. This all shows the lack of communication as well as education.

With the serious violation of state and federal law and the undermining of the Charlotte County. Republican Executive Committee. I would request that the Charters of the Charlotte County. Republican Club and the West Charlotte County Republican Club be invalidated, ASAP by you.

This is the only way the CCREC is going to be able to rebuild and be effective in the future.

22. I strongly suggest the CCREC Chairman join the WCCRC and perhaps visit the club and even set up a time to review the books and any concerns. To set back and make accusations of not only Charlotte County but other Counties is a little unfair. (One Mans' opinion).

Charlotte County State Committee Man Bob Starr is in agreement with request.

Thank you for your prompt attention to this matter.

Mike Brown, Chairman Charlotte County REC

Mike Brown

From: Rot

Robert Starr

Sent:

Monday, February 12, 2018 5:28 PM

To:

Blaise Ingoglia; George Riley; Mike Brown; Ben Gibson; Robert

Stari

Subject:

Fw: FW: Updates

Attachments:

2018 Events - Charlotte County Republican Clubs 02122018.pdf

2/12/2018

Chairman:

I just received this, schedule of 2018 events for the Charlotte County Republican Club, from Chairmen Brown. You will note in the attachment that the Charlotte County Republican Club intends to have several fund raising events which will raise thousands of dollars and they can only spend \$500.00 in support of candidates.

The Club is ALLOWING THE REC ONE EVENT.

Chairman Brown is experiencing some health problems and the stress of this situation with the two clubs is making his problems worse. I have decided to take the lead in the salvation of the Charlotte County REC.

Chairman Brown will be unable to attend the next quarterly as our Trump Dinner is the 7th of April. So a meeting with the two clubs for resolution at that time will not work.

The information we have provided previously and documented about club and CCREC illegal activity we believe warrants the revocation of the Charlotte County Republican Club and the West Charlotte County Republican Club charter now. You have two of the three REC officials required to charter clubs asking for revocation.

The Clubs and former Chairman Bill Folchi violation of Florida Statutes, Federal Campaign law, money laundering and disregard for the rules of the Republican Party of Florida, all which is documented requires charter revocation NOW.

If that is not possible I intend to immediately file a formal complaint with the Federal Election Commission and Florida Election Commission detailing allegations of criminal activity, for over 4 years.

Maybe it is time that someone goes to jail to stop these practices that are impacting local REC's and the Republican Party of Florida.

RPOF was made aware of this serious violation of Federal and State Election Law, in writing after the required in house 2016 audit of financial affairs of the Charlotte County REC for 2016.. I await your answer. Sincerely,

Bob Starr State Committeeman Charlotte County, fl..

---- Forwarded Message____

From: Mike Brown <

ţ>

To: Bob Starr

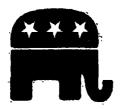
Sent: Monday, February 12, 2018, PM EST Subject: FW:

Updates

Bob,

Take note Charlotte Republican Club is doing Wild Hog Wild.

Mb



Charlotte County Republican Clubs —2018 Events

SAVE THE DATES CLUBS

EVENTS:

- 1. Tampa Bay Rays vs. Minnesota Twins Sunday, March 11 th Port Charlotte \$35 Per ticket Sky Boxes
- 2. Picnic Saturday April 21st Port Charlotte Beach Club
- 3. Picnic Saturday June 30th Port Charlotte Beach Club
- 4. Golf Tournament Saturday -July 21st Lemon Bay Country Club
- 5. Wild Hog Wild Saturday Sept. 15th Location TBD
- 6. Republican of the Year Saturday Oct, 27th Isles Yacht Club
- 23. Event 1 was a sell out with all four clubs participating

Event 2 was participated by all clubs except Buntstore who had an event that day

Event 3 has been canceled due to major Republican event in Orlando same weekend

Event 4 is the 10th annual golf outing

Event 5 to my understanding is a annual event help by the CCRC

Event 6 to my understanding is an annual event that was started by the CCRC

I'm not sure what is wrong with the above events. WCCRC has held other event in the past in addition to those. The purpose is to get Republicans Elected and get people excited and reaching out to the local people.

REC EVENT:

Trump/Reagan Day (Lincoln Day) — Saturday — April 7th
 Charlotte County Cultural Center — Port Charlotte - \$75
 per person

DESCRIPTION OF PRELIMINARY PROCEDURES FOR PROCESSING COIWLAINTS FILED w1TH THE FEDERAL ELECTION COMMISSION

1050 First street, NE
Washington, D.C. 20463
EMAIL **ela@fec.gov* FAX (202) 219-3923

Complaints filed with the Federal Election Commission shall be referred to the Enforcement Division of the Office of the General Counsel, where they are assigned a MUR (Matter Under Review) number and forwarded to Complaints Examination & Legal Administration ("CELA") for processing. Within five days of receipt of the complaint, the Commission shall notify all respondents referenced in the complaint, in writing, that the complaint has been filed, and shall include with such notification a copy of the complaint. Simultaneously, the complainant shall be notified that the complaint has been received. The respondents shall then have 15 days to demonstrate, in writing, that no action should be taken against them in response to the complaint. If additional time is needed in which to respond to the complaint, the respondents may request an extension of time. The request must be in writing and demonstrate good cause as to why an extension should be granted. Please be advised that not all requests are granted.

After the response period has elapsed, cases are prioritized and maintained in CELA. Cases warranting the use of Commission resources are assigned as staff becomes available. Cases not warranting the use of Commission resources are dismissed.

If a case is assigned to a staff person, the Office of the General Counsel shall report to the Commission, making recommendations based upon a preliminary legal and factual analysis of the complaint and any submission made by the respondent. The report may recommend that the Commission: (a) find reason to believe that the complaint sets forth a possible violation of the

Federal Election Campaign Act of 1971, as amended, (hereinafter the "Act'); or (b) find no reason to believe that the complaint sets forth a possible violation of the Act and, accordingly, close the

If, by an affirmative vote of four Commissioners, the Commission determines that there is reason to believe that a respondent has committed or is about to commit a violation of the Act, the Office of the General Counsel shall open an investigation into the matter. During the investigation, the Commission has the power to subpoena documents, to subpoena individuals to appear for deposition, and to order written answers to interrogatories. A respondent may be contacted more than once by the Commission during this phase.

If during this period of investigation, a respondent indicates a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe that a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is an agreement signed by the Commission and the respondent. The Conciliation Agreement must be adopted by four votes of the Commission in order to become final. After signature by the Commission and the respondent, the Conciliation Agreement is made public within 30 days of closing of the entire file.

If the investigation warrants, and no conciliation agreement has been entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent of his/her intent to recommend that the Commission proceed to a vote on probable cause to believe that a violation of the Act has been committed or is about to be committed. The General Counsel shall send the respondent a brief setting forth his/her position on the legal and factual issues of the case. A response brief stating respondent's position on the issues may be submitted within 15 days of receipt of the General Counsel's Brief. Both briefs are then filed with the Commission Secretary and considered by the Commission. Thereafter, if the Commission determines, by an affirmative vote of four Commissioners, that there is probable cause to believe that a violation of the Act has been committed or is about to be committed, the Commission must conciliate with the respondent for a period of at least 30 days, but not more than 90 days. If the Commission is unable to correct or prevent any violation through conciliation, the Office of the General Counsel may recommend that the Commission file a civil suit to enforce the Act against the respondent. Therefore, the

Commission may, upon the affirmative vote of four Commissioners, institute civil action for relief in the United States District Court.

see 52 U.S.C. § 30109 and 11 C.F.R. 1-1 1.

March 2018

Any correspondence sent to the Commission, such as a response, must be addressed to one of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail

OR

Email

Federal Election Commission

cela@fec.gov

Office of Complaints Examination

& Legal Administration

Attn: Kristina Portner

1050 First street, NE

Washington, DC 20463

If you have any questions, please contact Kristina Portner at (202) 694-1518 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Jeff S. Jordan

Assistant General Counsel

Complaints Examination

Legal Administration

Enclosures:

- 1. Complaint
- 2. Procedures
- 3. Designation of Counsel Statement

Exhibit 1







Prepared by: 'West Charlotte County Republican Club

Date: 4/29/2018

The following is the bank balances going back to the end of 2014 by month

	Balance	[Balance	
	<u>2015</u>	, (<u> 2017</u>	
January	9,197.04	January	11,488.66	
February	9,066.84	February	11,251.97	
March	7,566.52	March	10,748.71	
April	6,794.32	April	10,808.02	
May	7,202.12	May	12,871.84	
June	8,503.92	June	16,260.66	
July	12,277.70	July	16,498.70	
August	11,732.47	August	16,893.15	
September	11,942.47	September	16,577.47	
October	11,412.27	October	14,530.29	
November	12,040.99	November	15,031.11	
December	11,605.57	December	13,091.81	

	Balance		Balance	
1	<u> 2016</u>		<u> 2018</u>	
January	12,081.49	January		
February	12,339.29	February		
March	12,495.09	March		
April	12,329.89	April	13;210	
May	12,811.20	May		
June	15,343.51	June		
July	22,615.72	July		
August	17,638.79	August		
September	17,507.50	September		
October	11,069.82	October		
November	10,775.05	November		
December	10,042.67	December		

	1439 BATE 8-2-16 PAYTO REC FOR Club From FOR Club From		18 320	孝7 48	•
	DEDUCTIBLE	THIS CHECK CHECK CHECK TRANS +/- BALANCE	216	00 v	· •
63269	1440 DATE 8-2-16 PAYTO REC		18 104	48	***********
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Exhibita

Chris Murtha Accounting & Tax Services

2800 Placida Road

Grove City, Florida 34224

941 828 1280

Date: May 7, 2018

I, Chris Murtha shared office space with Douglas Curtis and his company 360 Merchant Solutions at the above address before and after the year 2016. We had a conference room that held approx. 10 people. The building complex is made up of small business with no retail and mostly businesses like accounting, insurance, financial investments, etc. There has never been a Donald Trump Headquarters. I know the landlord would not allow any type of Political Headquarters in this facility. I know Doug has held a few monthly meetings for the board members of the West Charlotte County Republican Club in the board room or sometimes at his Plumbing Company across town at his other office or at Leverrocks Restaurant in Placida.

I state this of my own free will with no threats or promises made to me.

Chris Murtha

STATE OF FLORIDA
COUNTY OF Charlotte
The foregoing instrument was acknowledged before me this day of
Bille D BUNSER
Notary Signature (Notary Seal)
Personally Known or Produced Identification
Type of Identification Produced Or U(I)

Exhibit 3







President Letter -- Doug Curtis January 16, 2018

Thanks to Lemon Bay Golf Club for providing a great Christmas meal at our meeting in December. For those who left early, you missed a great time with Tiki Tom and LA who provided live music. We ended up closing the place around 11:00. The staff joined in with singing and it was very festive. Yeah Baby great time by all

I'm honored to be voted in as your president for 2018. What I'm most proud of is the returning of most of last year's board members along with Weldon Rogers and John ------. This year is another important election year for we need to keep the Democrats from gaining power. In order for this to happen, we all need to work hard on helping our party. I have been attending meetings with the other clubs in Charlotte County and we all have decided we would work together on events and helping each club to increase its membership. Each club wishes to appoint one person to be on the board of the REC. If and when this ever occurs, the clubs become united and help give the Republican Party of Charlotte County the necessary edge/power to get our candidates elected in Charlotte County the state and national elections. This is where I need your help. We need new members and I am asking each of you to bring one couple to our meetings. I hope you would hype up our meetings with your friends by explaining what great guest speakers, great location, great food and our club is informative and fun.

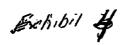
"Remember you make the difference"

At our meeting on January 16, we will be having Commissioner/Doctor Chris Constance as our guest speaker. Our club has heard him speak several times at our meeting and always he comes well prepared to speak about our county of what is happening and his thoughts of issues facing our county along with an update on medical marijuana. At our meeting, you will be most impressed with Commissioner /Doctor Constance background for his education, knowledge and experience as a doctor and Commissioner our most respected in and out of Charlotte County and the state of Florida. Please do not miss his talk and he always welcomes questions and feedback after speaking.

I am looking forward to seeing you and hear your opinions and comments of what is happening in politics in Charlotte County, State level and national. Please speak in order for us to understand and be informed about how others see things.

Exhibit 3 Con 1

How about a special event at the Comedy Club in Pt Charlotte sometime in February. Let's pick a date. Great food, lots of laughs, but it is all about being with one another.



Herald-Tribune

Charlotte GOP leader Starr resigns

By JASON WITZ / Correspondent

Posted Feb 27, 2011 at 4:27 PM

Bob Starr, chairman of the Charlotte County Republican Executive Committee for eight years, resigned this past weekend amid concerns over the direction of the organization.

Starr said Sunday that momentum within the group had sputtered in recent months because of what he called a growing "faction" of members who wanted to change the structure of operations from the core mission.

"Change can be good but there are certain fundamental rules and procedures which must be followed for any political organization to survive," he wrote in his resignation letter. "As I have spent the last 20 years working to build a powerful political force I do not intend to spend any time watching it being torn down."

And while his resignation came as a surprise, others believed a change was overdue.

Chris Connell, treasurer of the executive committee, said many felt Starr "ran the group like it was his personal club."

"There were no factions," Connell said. "I think people were sick of being excluded. It's not about the board. It's about the whole committee."

Starr's decision comes on the heels of a meeting last week in which tempers flared over the January removal of 41 members for unexcused absences.

Starr, who is also chairman of the Charlotte County Commission, said the affected members missed three or more of the yearly meetings, and the board approved of the ouster.

But Connell, who initially voted in favor of the measure, later questioned the decision and whether it even followed the bylaws.

"I think we acted in good faith," Starr said.

Starr credited the group for being instrumental in electing Republican candidates to local offices during his tenure, along with sending conservatives to Tallahassee and Washington, D.C.

Yet he began to have doubts about the future of the organization several months ago.

"I saw the handwriting on the wall," Starr said.

Starr said he expects more senior members of the group to resign in the coming weeks for similar reasons.

"It's sad. Really sad," he said. "This committee over the years has done a lot of good. Now I think it will become a social club."

Exhibit 5



May 21, 2018

Via e-mail

Douglas C. Curtis

Englewood, Florida 34224

RE: MUR 7376

Douglas C. Curtis

Dear Mr. Curtis:

This is in response to your letter dated May 21, 2018, requesting an extension to respond to the complaint filed in the above mentioned matter. After considering the circumstances in this matter, the Office of General Counsel has granted the requested extension. Accordingly, the response is due on or before the close of business on June 26, 2018. If you have any questions, you may contact me at cela@fec.gov.

Sincerely,

Kristina Portner

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Complaints Examination and

Legal Administration